

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

UNITED STATES OF AMERICA,  
*ex rel.* ALEX DOE, Relator,

THE STATES OF TEXAS,  
*ex rel.* ALEX DOE, Relator,

THE STATE OF LOUISIANA,  
*ex rel.* ALEX DOE, Relator,

Plaintiffs,

v.

PLANNED PARENTHOOD  
FEDERATION OF AMERICA, INC.,  
PLANNED PARENTHOOD GULF  
COAST, INC., PLANNED  
PARENTHOOD OF GREATER  
TEXAS, INC., PLANNED  
PARENTHOOD SOUTH TEXAS,  
INC., PLANNED PARENTHOOD  
CAMERON COUNTY, INC.,  
PLANNED PARENTHOOD SAN  
ANTONIO, INC.,

Defendants.

Civil Action No. 2-21-CV-022-Z

**APPENDIX TO TEXAS'S MOTION TO QUASH  
AND FOR PROTECTIVE ORDER**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

United States of America	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	CIVIL ACTION NO. 2:21-CV-
	§	00022-Z
The State of Texas	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
The State of Louisiana	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
Plaintiffs,	§	
v.	§	
Planned Parenthood Federation of America, Inc.,	§	
Planned Parenthood Gulf Coast, Inc., Planned	§	
Parenthood of Greater Texas, Inc., Planned	§	
Parenthood South Texas, Inc., Planned Parenthood	§	
Cameron County, Inc., Planned Parenthood San	§	
Antonio, Inc.,	§	
Defendants.		

**DEFENDANTS' NOTICE OF ORAL  
DEPOSITION OF STUART BOWEN**

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendants, by and through their attorneys, will take the oral and videotaped deposition of:

Witness:       Stuart Bowen

Date:            December 6, 2022

Time:            9:30 a.m. (CST)

Location:       Office of the Attorney General  
                    300 West 15th Street  
                    Austin, TX 78701

The deposition will be taken upon oral examination before a certified court reporter authorized by law to take depositions upon oral examination and will be stenographically and electronically recorded and will be videotaped. The oral examination will be taken pursuant to Federal Rules of Civil Procedure and is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Local Rules of the Court, the Federal Rules of Civil Procedure, and/or the Federal Rules of Evidence.

Said deposition will commence at the time stated above and will continue from day to day until completed, Sundays and Holidays excluded. Said deposition will be taken by a certified shorthand reporter and Notary Public or such other person authorized to administer oaths, at the place where the deposition is taking place or, should the deposition be undertaken remotely, will participate and administer the oath remotely.

Defendants reserve all rights regarding any documents or other written discovery that have not been timely provided in advance of depositions, including the right to question each witness about such materials at a later date.

Dated: October 31, 2022

Respectfully submitted,  
ARNOLD & PORTER KAYE SCHOLER LLP

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*Attorneys for Defendants Planned Parenthood  
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*Texas, Inc., Planned Parenthood of South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc.*

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*Attorneys for Defendant Planned Parenthood Federation of America, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 31, 2022, the foregoing document was served on all counsel of record via e-mail.

/s/ Tirzah S. Lollar

Tirzah S. Lollar

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

United States of America	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	CIVIL ACTION NO. 2:21-CV-
	§	00022-Z
The State of Texas	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
The State of Louisiana	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
Plaintiffs,	§	
v.	§	
Planned Parenthood Federation of America, Inc.,	§	
Planned Parenthood Gulf Coast, Inc., Planned	§	
Parenthood of Greater Texas, Inc., Planned	§	
Parenthood South Texas, Inc., Planned Parenthood	§	
Cameron County, Inc., Planned Parenthood San	§	
Antonio, Inc.,	§	
Defendants.		

**DEFENDANTS' NOTICE OF ORAL  
DEPOSITION OF TED SPEARS**

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendants, by and through their attorneys, will take the oral and videotaped deposition of:

Witness: Ted Spears

Date: December 7, 2022

Time: 9:30 a.m. (CST)

Location: Office of the Attorney General  
300 West 15th Street  
Austin, TX 78701

The deposition will be taken upon oral examination before a certified court reporter authorized by law to take depositions upon oral examination and will be stenographically and electronically recorded and will be videotaped. The oral examination will be taken pursuant to Federal Rules of Civil Procedure and is being taken for the purpose of discovery, for use at trial,

or for such other purposes as are permitted under the Local Rules of the Court, the Federal Rules of Civil Procedure, and/or the Federal Rules of Evidence.

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Dated: October 31, 2022

Respectfully submitted,  
ARNOLD & PORTER KAYE SCHOLER LLP

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/s/ Tirzah S. Lollar

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